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March 22, 2022

The Honorable May Kay Vyskocil
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 3/24/2022

VIA ECF

Re: *Tavarez v. FCA US LLC*, Case No. 1:21-cv-09825 (MKV)

Dear Judge Vyskocil:

We represent plaintiff Victoriano Tavarez (“Plaintiff”) in the above-referenced class action. We respectfully write pursuant to this Court’s Individual Rules of Practice in Civil Cases 2(G) to request a brief adjournment of six days for Plaintiff to file its opposition to Defendant’s motion to dismiss.

Defendant filed its motion to dismiss the first amended Class action complaint on March 9, 2022. See Docket No. 21. Defendant’s opposition would be due on March 23, 2022. Plaintiff respectfully requests that it’s time to file an opposition be extended six days to March 29, 2022 to allow ongoing settlement negotiations to continue. This is Plaintiff’s first request for an extension, and Defendant does not oppose this request to the Court. Defendant’s time to file any reply to the opposition would likewise be extended by six days.

Respectfully submitted,
/s/ William J. Downes
William J. Downes, Esq.

Cc: All Counsel of Record (via ECF)

Granted. SO ORDERED.

Date: March 24, 2022
New York, New York

A handwritten signature in blue ink that reads "Mary Kay Vyskocil". Below the signature, the name "Mary Kay Vyskocil" is typed in a smaller, black font, followed by "United States District Judge".